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Vice President Regulatory Affairs UCKET FITE CUPY ORIGINAL EX PARTE OR LATE FILED

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JUN 23 1998

FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

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June 22, 1998

Magalie Roman Salas Secretary Federal Communications Commission Room 222 1919 M Street, N.W. Washington, D.C. 20554 **YIACOM**

RE: Oral/Written Ex Parte Presentation

MM Docket Nos. 87-7, 91-221 (Local Television Ownership)

Dear Ms. Salas:

On June 22, 1998, representatives of Viacom Inc. ("Viacom") met with Anita Wallgren, Legal Advisor to Commissioner Susan Ness, in connection with the above-captioned rule making proceeding. The Viacom representatives were Steve Goldman and myself. The nature and scope of the oral presentation were limited to the ownership issues addressed in Viacom's comments filed on February 7, 1997 in response to the Second Further Notice of Proposed Rule Making. With respect to the issue of TV duopolies, Viacom submitted a one-page position paper, as well as two pages of tables detailing distances between DMAs. Viacom also submitted a chart demonstrating the inconsistent ownership combinations that could result from a Grade A/DMA standard. (The Grade A contours were determined by reference to the 1998 Television and Cable Factbook.) Copies of all those submissions are attached hereto.

The proceeding at issue is a non-restricted proceeding in which presentations are permitted, but must be disclosed. Accordingly, this letter and a copy, as well as the attachments, are being filed pursuant to Section 1.1206 of the Commission's Rules.

Sincerely.

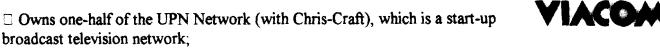
Anne Lucey

cc: Anita Wallgren (w/o attachments)

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Viacom Inc.



Owns Paramount Stations Group (PSG), which is the licensee of 15 commercial broadcast TV stations. PSG also programs 2 additional TV stations pursuant to out-ofmarket LMAs. (One is West Palm-DMA TV station, operated from PSG's Miami-DMA TV station, and the second is a Providence-DMA market TV station, operated from PSG's Boston-DMA TV station); and

Position on Duopolies:

☐ The Commission should adopt a DMA-only standard, one that permits a party to own TV stations, so long as the stations are located in different DMAs.

Rationale

- Grade A and Grade B standards are rooted in engineering and do not represent the geographic scope of competition between TV stations.
- Because Grade A contours vary greatly —depending upon the location of a station's transmitter, its height and its power level— a Grade A/DMA standard could lead to the anomalous and unfair result of permitting certain TV ownership combinations in two DMAs while prohibiting others in the same DMAs. [See accompanying tables.]
- TV stations direct their resources and personnel to attaining superior ratings within their given DMAs, not within their Grade A or Grade B contours.
- Efficiencies are possible in TV station combinations in which each TV station is located in separate, but adjacent, DMAs.
- These efficiencies are crucial to the competitiveness and economic stability of emerging broadcast television networks, such as UPN.
- Survival of UPN and other emerging networks will yield diversity of programming voices.

TOP 50 MARKETS PROXIMITY TO CLOSEST TOP 50 MARKET

Rank	Market	Closest Top 50 Market	Distance
1	New York	Philadelphia	101
2	Los Angeles	San Diego	124
3	Chicago	Milwaukee	92
4	Philadelphia	New York	101
5	San Francisco	Sacramento	95
6	Boston	Providence	50
7	Washington	Baltimore	45
8	Dallas	Oklahoma City	208
9	Detroit	Cleveland	100
10	Atlanta	Greenville	142
11	Houston	San Antonio	197
12	Seattle	Portland, OR	174
13	Cleveland	Detroit	100
14	Minneapolis	Milwaukee	310
15	Tampa	Orlando	84
16	Miami	W. Palm Bch.	66
17	Phoenix	San Diego	350
18	Denver	Salt Lake City	490
19	Pittsburgh	Cleveland	157
20	Sacramento	San Francisco	95
21	St. Louis	Indianapolis	246
22	Orlando	Tampa	84
23	Baltimore	Washington	45
24	Portland, OR	Seattle	174
25	Indianapolis	Cincinnati	110
26	San Diego	Los Angeles	124
27	Hartford	Providence	87
28	Charlotte	Greenville	90
29	Raleigh	Greensboro	74
30	Cincinnati	Louisville	103
31	Kansas City	St. Louis	256
32	Milwaukee	Chicago	92
33	Nashville	Memphis	210
34	Columbus, OH	Cincinnati	111
35	Greenville	Charlotte	90
36	Salt Lake City	Denver	490
37	Grand Rapids	Detroit	156
38	San Antonio	Houston	197
39	Norfolk	Washington	156
40	Buffalo	Cleveland	191
41	New Orleans	Houston	340
42	Memphis	Nashville	210
43	W. Palm Bch.	Miami	66
44	Oklahoma City	Dallas	208
45	Harrisburg	Baltimore	- 87
46	Greensboro	Raleigh	7 4
47	Wilkes-Barre	Harrisburg	122
48	A!buguerque	Phoenix	420
49	Providence	Boston	
50	Louisville	Cincinnati	50 103
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^{*}Distances taken from 1995 Rand McNally Road Atlas and are approximate.

TOP 50 MARKETS PROXIMITY TO CLOSEST TOP 50 MARKET SORTED BY MARKETS CLOSEST TO ONE ANOTHER

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18 Denver Salt Lake City 490	48		•		
•	18	· ·			
	36	Salt Lake City	•	490	

Distances taken from 1995 Rand McNally Road Atlas and are approximate.....

Rationale for Eliminating Grade A Overlap Restriction

Television Markets Within 80 Miles

	Distance Grade A Overlap		Overlap	Distance	No Grade	A Overlap	
Market / Rank / % of US	Market / Rank / % of US		Station / City of License / Affil.	Station / City of License / Affil.	In Miles	Station / City of License / Affil.	Station / City of License / Affil
New York / 1 / 6.9%	Hartford-New Haven / 27 / .9%	73 73	WPIX-11 / New York / WB WABC-7 / New York / ABC	WTNH-8 / New Haven / ABC WTNH-8 / New Haven / ABC	103 111	WNBC-4 / New York / NBC WPIX-11 / New York / WB	WVIT-30 / New Britain / NBC WFSB-3 / Hartford / CBS
Philadelphia / 4 / 2.7%	Harrisburg-Lancaster-Lebanon-York / 45 / .6%	74 74	WCAU-10 / Philadelphia / NBC WPSG-57 / Philadelphia / UPN	WGAL-8 / Lancaster / NBC WLYH-15 / Lancaster / UPN	104 114	WPHL-17 / Philadelphia / WB WPVI-6 / Philadelphia / ABC	WPMT-43 / York / WB WHTM-27 / Harrisburg / ABC
	Baltimore / 23 / 1%	35	All Stations have a Grade A Overlap				
Detroit / 9 / 1.8%	Toledo / 66 / .4%	62	All Stations have a Grade A Overlap			,	
Detroit / 9 / 1.8%	Flint-Saginaw-Bay City / 63 / .5%	64/101	All Stations have a Grade A Overlap (Except with WNEM-5 / Bay City / CBS)		111	All Detroit Stations	WNEM-5 / Bay City / CBS
Miami-Ft. Lauderdale / 16 / 1.4%	West Palm Beach-Ft. Pierce / 43 / .6%	126 86	WBFS-33 / Miami / UPN WSVN-7 / Miami / FOX	WTVX-34 / Ft. Pierce / UPN WPBF-25 / Tequesta(W. Palm) / ABC	86	WTVJ-6 / Miami / NBC	WPBF-25 / Tequesta(W. Palm) / ABC
Pittsburgh / 19 / 1.2%	Wheeling-Steubenville / 138 / .2%	45/35	45/35 All Stations have a Grade A Overlap				
Pittsburgh / 19 / 1.2%	Johnstown-Altoona / 92 / .3%	68 68	WPGH-53 / Pittsburgh / FOX WPXI-11 / Pittsburgh / NBC	WWCP-8 / Johnstown / FOX WJAC-6 / Johnstown / NBC	95 95	WPGH-53 / Pittsburgh / FOX WPXI-11 / Pittsburgh / NBC	WATM-23 / Altoona / ABC WTAJ-10 / Altoona / CBS
Baltimore / 23 / 1%	Harrisburg-Lancaster-Lebanon-York / 45 / .6%	87/60/75/48 All Stations have a Grade A Overtap					
Hartford-New Haven / 27 / .9%	Springfield-Holyoke / 103 / .2%	26/32	26/32 All Stations have a Grade A Overlap				
Hartford-New Haven / 27 / .9%	Providence-New Bedford / 49 / .6%	95	WVIT-30 / New Britain / NBC	WPRI-12 / Providence / CBS	95	WVIT-30 / New Britain / NBC	WJAR-10 / Providence / NBC
Charlotte / 28 / .9%	Greensboro-Highpoint-Winston Salem / 46 / .6%	97/89/81	89/81 All Stations have a Grade A Overlap				
Charlotte / 28 / .9%	Greenville-Spartanburg-Asheville / 35 / .7%	70	WCNC-36 / Charlotte / NBC	WSPA-7 / Spartanburg / CBS	90	WCNC-36 / Charlotte / NBC	WYFF-4 / Greenville / NBC
Raleigh / 29 / .8%	Greensboro-Highpoint-Winston Salem / 46 / .6%	74	WRAL-5 / Raleigh / CBS	WFMY-2 / Greensboro / CBS	95	WRAL-5 / Rallegh / CBS	WXII-12 / Winston Salem / NBC
Raleigh / 29 / .8%	Greenville, NC-New Bern-Washington / 106 / .2%	82	WRAL-5 / Raleigh / CBS	WNCT-9 / Greenville, NC / CBS	82	WLFL-22 / Raleigh / FOX	WNCT-9 / Greenville,NC / CBS
Cincinnati / 30 / .8%	Dayton / 53 / .5%	55	55 All Stations have a Grade A Overlap				
Milwaukee / 32 / .8%	Madison / 84 / .3%	77	WDJT-58 / Milwaukee / CBS	WKOW-27 / Madison / ABC	77	WCGV-24 / Milwaukee / IND	WMSN-47 / Madison / FOX
San Antonio / 38 / .7%	Austin / 60 / .5%	83	KSAT-12 / San Antonio / ABC	KTBC-7 / Austin / FOX	67	KRRT-35 / Kerrville(San Antonio) / WB	KTBC-7 / Austin / FOX